

REMARKS

Claims 1-3, 5-13, 15-19, 21, and 22 were pending and stand rejected. Claims 1, 6, 10, and 21 are amended. Claims 5 and 15 are canceled. Claim 23 is newly added. Claims 1-3, 6-13, 16-19, 21-23 are pending upon entry of this amendment. Support for new claim 23 is found throughout the specification, including at page 9, lines 25-27.

35 U.S.C. § 102(e) and 103(a) Rejections

Claims 1, 9-10, 18-19, and 21-22 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Moore et al. (U.S. Patent No. 7,000,015). Claims 2-3, 5-8, 11-13, and 15-17 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Moore in view of Aaron (U.S. Publication No. 2004/0268150). Applicant respectfully traverses these rejections as applied to the amended claims.

The independent claims recite elements related to associating computer network identifications with network policies. For example, independent claim 1 recites:

analyzing a network interface associated with a client computer using a plurality of network detectors, the detectors outputting a set of netspecs, each netspec comprising a first token identifying a detector used for the analysis and a second token identifying the analyzed network interface;
sorting the set of netspecs in a priority order based at least in part on **the reliability of the detectors that output the netspecs**;
associating the network identifications made by the set of netspecs with locations based at least in part on the priority order of the set of netspecs;
and
feeding associated network identification/location pairs to a network interface module to implement desired network policies.

Thus, amended independent claim 1 recites, *inter alia*, “sorting [a] set of netspecs in a **priority order** based at least in part on **the reliability of the detectors that output the netspecs...**” (emphasis added). Amended independent claims 10 and 21 recite similar

elements. Support for these amendments is found throughout the specification, including at the carryover paragraph on pp. 7-8. Claim 5 previously recited elements related to prioritizing the netspecs.

The Moore reference at least does not disclose or suggest “sorting [a] set of netspecs in a priority order based at least in part on the reliability of the detectors that output the netspecs...” as recited in amended independent claims 1, 10, and 21. Moore describes a service that discovers the physical locations of a host computer’s connections to logical networks and provides that information to other applications operating on the host computer. *See* Moore, Abstract. A Network Location Resolution Service Provider (“NLRSP”) operates on the host computer and shares a common API with other applications operating on the host computer. The NLRSP contacts the drivers for each new network interface available to the host computer, determines the GUID (globally unique identifier) for each new interface, and then communicates the determined GUID information to other applications operating on the host computer through the common API. *See* Moore, 13:30-38 and 14:30-34. Thus, at most Moore discloses determining GUID information for each new network interface.

However, Moore does not disclose or suggest “sorting [a] set of netspecs in a priority order based at least in part on the reliability of the detectors that output the netspecs” as recited by amended claim 1. The Examiner essentially acknowledges as much in the rejection of claim 5 made in the Office Action at paragraph 18. The Examiner asserts that sorting the set of netspecs in the priority order is disclosed in Aaron at paragraph [0050].

Aaron discloses a system for providing network-based firewall policy configuration and facilitation. *See* Aaron, Abstract. A policy modification agent (“PMA”) resides on a memory along with an operating system. *See* Aaron, [0028]. A user sends a notification to a

firewall facilitation coordinator (“FFC”) to modify the user’s firewall policy for a new application. The FFC receives the notification and authenticates the user. The FFC sends a request to the PMA seeking modification of the firewall policy as applied to the new application. *See* Aaron, [0044]. Upon receiving the request, the PMA initiates an “exercise period”. During the exercise period the PMA observes packets associated with the new application. *See* Aaron, [0046]. The PMA then generates rules for filtering the packets based on whether questionable packets are observed during this exercise period. *See* Aaron, [0047]-[0050] and FIGS. 5A-5D. However, like Moore, Aaron does not disclose sorting a set of netspecs in a priority order based at least in part on the reliability of the detectors that output the netspecs.

Paragraph [0050] discloses further details about the exercise period and not prioritizing a set of netspecs. Specifically, if the PMA observes questionable packets during the exercise period, it will sort the questionable packets into groups based on packet types and prioritize these groups based on the likelihood that the packets will be required for the new application to function through the firewall. *See* Aaron, ¶ [0049]-[0050]. Thus, at most Aaron discloses prioritization of groups of questionable packets. There is no disclosure, however, of sorting a set of netspecs in a priority order, much less sorting a set of netspecs in a priority order based at least in part on the reliability of the detectors that output the netspecs.

Thus, Moore and Aaron, either alone or in the combination suggested by the Examiner, do not teach or suggest every element of independent claims 1, 10, and 21. The GUID information disclosed by Moore is different from the groups of questionable packets disclosed by Aaron. A person of ordinary skill in the art aware of the prioritization of groups

of questionable packets disclosed by Aaron would not be lead to modify Moore to prioritize GUID information. Moreover, even if such a person did modify Moore based on Aaron, the result would still not arrive at the claimed invention because neither Moore nor Aaron teach or suggest a priority order “based at least in part on the **reliability of the detectors that output the netspecs**”.

Accordingly, Applicant respectfully submits that the cited references do not teach or suggest every element of amended claims 1, 11, and 21. Therefore, the independent claims are not anticipated by the cited references, and a person of ordinary skill in the art would considering the references either individually or in combination would not find the claimed invention obvious. The dependent claims not mentioned above incorporate the elements of their base claims and are therefore not anticipated or obvious for at least the same reasons.

CONCLUSION

Should the Examiner wish to discuss the above amendments and remarks, or if the Examiner believes that for any reason direct contact with Applicant's representative would help to advance the prosecution of this case to finality, the Examiner is invited to telephone the undersigned at the number given below.

Respectfully Submitted,
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